

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re:

YOUFIT HEALTH CLUBS, LLC, et al.,<sup>1</sup>

Debtors.

Chapter 11

Case No. 20-12841 (MFW)

(Jointly Administered)

NOTICE OF **AMENDED**<sup>2</sup> AGENDA FOR MATTERS SCHEDULED FOR  
TELEPHONIC HEARING ON DECEMBER 4, 2020 AT 10:30 A.M.

THE HEARING WILL BE HELD TELEPHONICALLY VIA  
COURTCALL AND, IN CERTAIN CIRCUMSTANCES, BY  
VIDEO VIA ZOOM. ONLY THOSE PARTIES THAT WILL BE  
ADDRESSING THE COURT SHOULD APPEAR BY VIDEO VIA  
ZOOM IN ADDITION TO THEIR COURTCALL  
REGISTRATION.

TO APPEAR BY VIDEO CONFERENCE, PARTIES SHOULD  
USE THE FOLLOWING INFORMATION:

JOIN ZOOMGOV HEARING:

<https://debuscourts.zoomgov.com/j/1617714641>

MEETING ID: 161 771 4641 PASSWORD: 819992

**PLEASE NOTE:** AUDIO MUST BE MUTED IN ZOOM ONCE CONNECTED.  
COURTCALL, LLC WILL PROVIDE THE AUDIO FOR THE HEARING.

TO APPEAR TELEPHONICALLY, PARTIES SHOULD CONTACT  
COURTCALL, LLC AT 866-582-6878  
TO REGISTER THEIR APPEARANCE.

<sup>1</sup> The last four digits of YouFit Health Clubs, LLC's tax identification number are 6607. Due to the large number of debtor entities in these chapter 11 cases, for which joint administration has been requested, a complete list of the debtor entities and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the proposed claims and noticing agent at [www.donlinrecano.com/yfhc](http://www.donlinrecano.com/yfhc). The mailing address for the debtor entities for purposes of these chapter 11 cases is: 1350 E. Newport Center Dr., Suite 110, Deerfield Beach, FL 33442.

<sup>2</sup> Amended items appear in bold.

UNCONTESTED MATTERS GOING FORWARD:

1. Motion of the Debtors for Entry of an Order (I) Authorizing the Debtors to File (A) A Consolidated Master List of Creditors and (B) A Consolidated List of the Debtors' 30 Largest General Unsecured Creditors, and (II) Authorizing the Debtors to Redact Personally Identifiable Information for Certain Individual Creditors and Parties in Interest [Docket No. [4](#), Filed November 9, 2020]

Response Deadline: November 30, 2020 at 4:00 p.m. (for final approval)

Responses Received:

- A. Informal comments from the Office of the United States Trustee.

Related Documents:

- A. Declaration of Brian Gleason in Support of the Debtors' Chapter 11 Petitions and Requests for First Day Relief [Docket No. [11](#), Filed November 9, 2020]
- B. Interim Order Authorizing the Debtors to (I) File (A) a Consolidated Master List of Creditors and (B) a Consolidated List of the Debtors' 30 Largest General Unsecured Creditors, and (II) Authorizing the Debtors to Redact Personally Identifiable Information for Certain Individual Creditors and Parties in Interest [Docket No. [58](#), Filed November 10, 2020]
- C. Omnibus Notice of First Day Pleadings, Entry of Certain Interim Orders, and Final Hearing Thereon [Docket No. [62](#), Filed November 11, 2020]
- D. Certification of Counsel [Docket No. [192](#), Filed December 3, 2020]**

**Status: A proposed final order has been filed under certification of counsel. No hearing is necessary unless the Court has questions on this matter.**

2. Motion of the Debtors for Entry of Interim and Final Orders Authorizing (A) the Debtors to Pay Prepetition Taxes and Fees in the Ordinary Course of Business, and (B) Banks and Financial Institutions to Honor and Process Checks and Transfers Related Thereto [Docket No. [5](#), Filed November 9, 2020]

Response Deadline: November 30, 2020 at 4:00 p.m. (for final approval)

Responses Received: None.

Related Documents:

- A. Declaration of Brian Gleason in Support of the Debtors' Chapter 11 Petitions and Requests for First Day Relief [Docket No. [11](#), Filed November 9, 2020]

- B. Interim Order Authorizing (A) the Debtors to Pay Prepetition Taxes and Fees in the Ordinary Course of Business, and (B) Banks and Financial Institutions to Honor and Process Checks and Transfers Related Thereto [Docket No. [54](#), Filed November 10, 2020]
- C. Omnibus Notice of First Day Pleadings, Entry of Certain Interim Orders, and Final Hearing Thereon [Docket No. [62](#), Filed November 11, 2020]
- D. Certificate of No Objection [Docket No. [180](#), Filed December 3, 2020]**
- E. Final Order Authorizing (A) The Debtors to Pay Prepetition Taxes and Fees in the Ordinary Course of Business, and (B) Banks and Financial Institutions To Honor and Process Checks and Transfers Related Thereto [Docket No. [194](#), Filed December 3, 2020]**

**Status: The Court has entered the order on this matter. No hearing is necessary.**

- 3. Motion of the Debtors for Entry of Interim and Final Orders (A) Authorizing the Maintenance of Bank Accounts and Continued Use of Existing Business Forms and Checks, (B) Authorizing the Continued Use of Cash Management System, (C) Waiving Certain Investment and Deposit Guidelines, and (D) Granting Administrative Expense Status to Postpetition Intercompany Claims [Docket No. [15](#), Filed November 9, 2020]

Response Deadline: November 30, 2020 at 4:00 p.m. (for final approval)

Responses Received: None.

Related Documents:

- A. Order (Interim) (A) Authorizing the Maintenance of Bank Accounts and Continued Use of Existing Business Forms and Checks, (B) Authorizing the Continued Use of Cash Management System, (C) Waiving Certain Investment and Deposit Guidelines, and (D) Granting Administrative Expense Status to Postpetition Intercompany Claims [Docket No. [47](#), Filed November 10, 2020]
- B. Omnibus Notice of First Day Pleadings, Entry of Certain Interim Orders, and Final Hearing Thereon [Docket No. [62](#), Filed November 11, 2020]
- C. Certificate of No Objection [Docket No. [179](#), Filed December 3, 2020]**
- D. Final Order (A) Authorizing the Maintenance of Bank Accounts and Continued Use of Existing Business Forms and Checks, (B) Authorizing the Continued Use of Cash Management System, (C) Waiving Certain Investment and Deposit Guidelines, and (D) Granting Administrative Expense Status to Postpetition Intercompany Claims [Docket No. [193](#), Filed December 3, 2020]**

**Status: The Court has entered the order on this matter. No hearing is necessary.**

4. Motion of the Debtors for Entry of an Administrative Order Establishing Procedures for Monthly, Interim, and Final Compensation and Reimbursement of Expenses of Professionals Retained in These Chapter 11 Cases [Docket No. [75](#), Filed November 13, 2020]

Response Deadline: November 30, 2020 at 4:00 p.m.

Responses Received:

- A. Informal comments from the Office of the United States Trustee.

Related Documents:

- A. Certification of Counsel [Docket No. [189](#), Filed December 3, 2020]

- B. Administrative Order Establishing Procedures for Monthly, Interim, and Final Compensation and Reimbursement of Expenses of Professionals Retained in These Chapter 11 Cases [Docket No. [202](#), Filed December 3, 2020]

**Status: The Court has entered the order on this matter. No hearing is necessary.**

5. Motion of the Debtors for Entry of an Order Authorizing the Retention and Payment of Professionals Utilized in the Ordinary Course of Business [Docket No. [77](#), Filed November 13, 2020]

Response Deadline: November 30, 2020 at 4:00 p.m.

Responses Received:

- A. Informal comments from the Office of the United States Trustee.

Related Documents:

- A. Certification of Counsel [Docket No. [188](#), Filed December 3, 2020]

- B. Order Authorizing the Retention and Payment of Professionals Utilized by the Debtors in the Ordinary Course of Business [Docket No. [201](#), Filed December 3, 2020]

**Status: The Court has entered the order on this matter. No hearing is necessary.**

6. Application of the Debtors for Entry of an Order Authorizing Retention and Employment of Red Banyan Group, LLC as Public Relations Consultant to the Debtors *Nunc Pro Tunc* as of the Petition Date [Docket No. [78](#), Filed November 13, 2020]

Response Deadline: November 30, 2020 at 4:00 p.m.

Responses Received:

- A. Informal comments from the Office of the United States Trustee.

Related Documents:

- A. Supplemental Declaration of Evan Nierman in Support of the Application of the Debtors for Entry of an Order Authorizing Retention and Employment of Red Banyan Group, LLC as Public Relations Consultant to the Debtors *Nunc Pro Tunc* as of the Petition Date [Docket No. [156](#), Filed November 30, 2020]
- B. Certification of Counsel [Docket No. [184](#), Filed December 3, 2020]**
- C. Order Authorizing Retention and Employment of Red Banyan Group, LLC as Public Relations Consultant to the Debtors *Nunc Pro Tunc* as of the Petition Date [Docket No. [197](#), Filed December 3, 2020]**

**Status: The Court has entered the order on this matter. No hearing is necessary.**

- 7. Application of the Debtors for Entry of an Order Authorizing the Debtors to Employ and Retain Hilco Real Estate, LLC as the Debtors' Real Estate Consultant *Nunc Pro Tunc* to the Petition Date [Docket No. [79](#), Filed November 13, 2020]

Response Deadline: November 30, 2020 at 4:00 p.m.

Responses Received:

- A. Informal comments from the Office of the United States Trustee.

Related Documents:

- A. Supplemental Declaration of Sarah Baker in Support of the Application of the Debtors for Entry of an Order Authorizing the Debtors to Employ and Retain Hilco Real Estate, LLC as the Debtors' Real Estate Consultant and Advisor, Effective *Nunc Pro Tunc* to the Petition Date [Docket No. [155](#), Filed November 30, 2020]
- B. Certification of Counsel [Docket No. [183](#), Filed December 3, 2020]**
- C. Order Authorizing the Debtors to Employ and Retain Hilco Real Estate, LLC as the Debtors' Real Estate Consultant and Advisor, Effective *Nunc Pro Tunc* to the Petition Date [Docket No. [196](#), Filed December 3, 2020]**

**Status: The Court has entered the order on this matter. No hearing is necessary.**

- 8. Motion of the Debtors for Entry of an Order (I) Authorizing the Debtors to Employ and Retain Phoenix Executive Services, LLC to Provide the Debtors with a Chief Restructuring Officer and Additional Personnel and (II) Designating Brian Gleason and

the Debtors' Chief Restructuring Officer, *Nunc Pro Tunc* to the Petition Date [Docket No. [80](#), Filed November 30, 2020]

Response Deadline: November 30, 2020 at 4:00 p.m.

Responses Received:

A. Informal comments from the Office of the United States Trustee.

Related Documents:

A. Supplemental Declaration of Brian Gleason in Support of the Motion of the Debtors for an Order (I) Authorizing the Debtors to Employ and Retain Phoenix Executive Services, LLC to Provide the Debtors with a Chief Restructuring Officer and Additional Personnel and (II) Designating Brian Gleason as the Debtors' Chief Restructuring Officer, *Nunc Pro Tunc* to the Petition Date [Docket No. [159](#), Filed November 30, 2020]

**B. Certification of Counsel [Docket No. [182](#), Filed December 3, 2020]**

**C. Order (I) Authorizing the Debtors to Employ and Retain Phoenix Executive Services, LLC to Provide the Debtors with a Chief Restructuring Officer and Additional Personnel and (II) Designating Brian Gleason as the Debtors' Chief Restructuring Officer, *Nunc Pro Tunc* to the Petition Date [Docket No. [195](#), Filed December 3, 2020]**

**Status: The Court has entered the order on this matter. No hearing is necessary.**

9. Debtors' Application to Employ and Retain FocalPoint Securities, LLC as Investment Banker, Effective *Nunc Pro Tunc* to the Petition Date [Docket No. [81](#), Filed November 13, 2020]

Response Deadline: November 30, 2020 at 4:00 p.m.

Responses Received:

A. Informal comments from the Office of the United States Trustee.

Related Documents:

A. Supplemental Declaration of Richard F. NeJame in Support of the Debtors' Application to Employ and Retain FocalPoint Securities, LLC as Investment Banker to the Debtors, Effective *Nunc Pro Tunc* to the Petition Date [Docket No. [154](#), Filed November 30, 2020]

**B. Certification of Counsel [Docket No. [187](#), Filed December 3, 2020]**

**C. Order Authorizing Debtors to Employ and Retain FocalPoint Securities,**

**LLC as Investment Banker to the Debtors, Effective *Nunc Pro Tunc* to the Petition Date [Docket No. [200](#), Filed December 3, 2020]**

**Status: The Court has entered the order on this matter. No hearing is necessary.**

10. Application of the Debtors for Entry of an Order Authorizing the Employment and Retention of Donlin, Recano & Company, Inc. as Administrative Agent *Nunc Pro Tunc* to the Petition Date [Docket No. [82](#), Filed November 13, 2020]

Response Deadline: November 30, 2020 at 4:00 p.m.

Responses Received:

- A. Informal comments from the Office of the United States Trustee.

Related Documents:

- A. Supplemental Declaration of Nellwyn Voorhies in Support of the Application of the Debtors for Entry of an Order Authorizing the Employment and Retention of Donlin, Recano & Company, Inc. as Administrative Agent for the Debtors Effective *Nunc Pro Tunc* to Petition Date [Docket No. [170](#), Filed December 2, 2020]

- B. Certification of Counsel [Docket No. [186](#), Filed December 3, 2020]**

- C. Order Approving Application of the Debtors for Entry of an Order Authorizing the Employment and Retention of Donlin, Recano & Company, Inc. as Administrative Agent *Nunc Pro Tunc* to the Petition Date [Docket No. [198](#), Filed December 3, 2020]**

**Status: The Court has entered the order on this matter. No hearing is necessary.**

11. Application of the Debtors for Entry of an Order Authorizing the Employment and Retention of Greenberg Traurig, LLP as Counsel for the Debtors and Debtors in Possession, *Nunc Pro Tunc* to the Petition Date [Docket No. [83](#), Filed November 14, 2020]

Response Deadline: November 30, 2020 at 4:00 p.m.

Responses Received:

- A. Informal comments from the Office of the United States Trustee.

Related Documents:

- A. Supplemental Declaration of Nancy A. Peterman in Support of Application of the Debtors for Entry of an Order Authorizing the Employment and Retention of Greenberg Traurig, LLP as Counsel for**

**the Debtors and Debtors in Possession, *Nunc Pro Tunc* to the Petition Date [Docket No. [191](#), Filed December 3, 2020]**

**B. Certification of Counsel [Docket No. [205](#), Filed December 3, 2020]**

**Status: A proposed order has been filed under certification of counsel. No hearing is necessary unless the Court has questions on this matter.**

**CONTESTED MATTERS GOING FORWARD:**

12. Motion of Debtors for Entry of Interim and Final Orders (A) Prohibiting Utility Providers from Discontinuing, Altering or Refusing Service; (B) Deeming Utility Providers Adequately Assured of Future Performance; (C) Establishing and Approving Procedures for Determining Assurance of Payment; and (D) Granting Related Relief [Docket No. [9](#), Filed November 9, 2020]

Response Deadline: November 30, 2020 at 4:00 p.m. (for final approval)

Responses Received:

- A. Objection of Certain Utility Companies to the Motion of Debtors for Entry of Interim and Final Orders (A) Prohibiting Utility Providers from Discontinuing, Altering or Refusing Service; (B) Deeming Utility Providers Adequately Assured of Future Performance; (C) Establishing and Approving Procedures for Determining Assurance of Payment; and (D) Granting Related Relief [Docket No. [124](#), Filed November 23, 2020]
- B. Informal responses of certain utilities.
- C. Supplemental Objection of Florida Power & Light Company to the Motion of Debtors for Entry of Interim and Final Orders (A) Prohibiting Utility Providers from Discontinuing, Altering or Refusing Service; (B) Deeming Utility Providers Adequately Assured of Future Performance; (C) Establishing and Approving Procedures for Determining Assurance of Payment; and (D) Granting Related Relief [Docket No. [175](#), Filed December 2, 2020]**

Related Documents:

- A. Declaration of Brian Gleason in Support of the Debtors' Chapter 11 Petitions and Requests for First Day Relief [Docket No. [11](#), Filed November 9, 2020]
- B. Interim Order (A) Prohibiting Utility Providers from Discontinuing, Altering or Refusing Service; (B) Deeming Utility Providers Adequately Assured of Future Performance; (C) Establishing and Approving Procedures for Determining Assurance of Payment; and (D) Granting Related Relief [Docket No. [55](#), Filed November 10, 2020]



C. Omnibus Notice of First Day Pleadings, Entry of Certain Interim Orders, and Final Hearing Thereon [Docket No. [62](#)], Filed November 11, 2020]

**D. Notice of Withdrawal of (1) Objection of Certain Utility Companies to the Motion of Debtors for Entry of Interim and Final Orders (A) Prohibiting Utility Providers from Discontinuing, Altering or Refusing Service; (B) Deeming Utility Providers Adequately Assured of Future Performance; (C) Establishing and Approving Procedures for Determining Assurance of Payment; and (D) Granting Related Relief; and (2) Supplemental Objection [Docket No. [190](#), Filed December 3, 2020]**

**E. Certification of Counsel [Docket No. [207](#), Filed December 3, 2020]**

**Status: A proposed final order has been filed under certification of counsel. No hearing is necessary unless the Court has questions on this matter.**

13. Omnibus Motion of the Debtors for Entry of an Order (I) Authorizing Debtor to (A) Reject Certain Equipment Leases and Unexpired Leases of Nonresidential Real Property, and (B) Abandon Certain Personal Property, if any, Each Effective as of the Petition Date, and (II) Granting Related Relief [Docket No. [28](#), Filed November 9, 2020]

Response Deadline: November 30, 2020 at 4:00 p.m.

Responses Received:

- A. Maricopa County Treasurers Objection To Omnibus Motion For Entry Of An Order (I) Authorizing Debtors To (A) Reject Certain Equipment Leases And Unexpired Leases On Nonresidential Real Property, And (B) Abandon Certain Personal Property, If Any, Each Effective As Of The Petition Date; And (II) Granting Related Relief, Docket No. [70](#), Filed November 12, 2020]
- B. Broward County's Objection and Notice of Joinder [Docket No. [158](#), Filed November 30, 2020]

Related Documents:

- A. Notice of Hearing on Omnibus Motion of the Debtors for Entry of an Order (I) Authorizing Debtor to (A) Reject Certain Equipment Leases and Unexpired Leases of Nonresidential Real Property, and (B) Abandon Certain Personal Property, if any, Each Effective as of the Petition Date, and (II) Granting Related Relief [Docket No. [60](#), Filed November 11, 2020]
- B. Declaration of Brian Gleason in Support of the Omnibus Motion of the Debtors for Entry of an Order (I) Authorizing Debtor to (A) Reject Certain Equipment Leases and Unexpired Leases of Nonresidential Real Property, and (B) Abandon Certain Personal Property, if any, Each Effective as of the Petition Date, and (II) Granting Related Relief [Docket No. [153](#), Filed

November 28, 2020]

Status: This matter is going forward.

14. Debtors' Motion for Entry of Interim and Final Orders, Pursuant to 11 U.S.C. §§ 105, 361, 362, 363, 364, 503 and 507, Bankruptcy Rules 2002, 4001, 6003, 6004 and 9014 and Local Bankruptcy Rules 2002-1 and 4001-2, (I) Authorizing the Debtors to Obtain Postpetition Senior Secured Superpriority Financing, (II) Authorizing the Debtors' Limited Use of Cash Collateral, (III) Granting Adequate Protection to the Prepetition Secured Parties, (IV) Scheduling a Final Hearing, and (V) Granting Related Relief [Docket No. [10](#), Filed November 9, 2020]

Response Deadline: November 30, 2020 at 4:00 p.m. (for final approval); extended to December 2, 2020 at 12:00 p.m. for the Committee

Responses Received:

- A. Objection of Maricopa County Treasurer To Debtors Motion For Entry Of Interim And Final Orders, Pursuant To 11 U.S.C. 105,361, 362, 363, 364, 503, And 507, Bankruptcy Rules 2002, 4001, 603 And 9014 And Local Bankruptcy Rules 2002-1 And 4001-2, (I) Authorizing The Debtors To Obtain Post-Petition Senior Secured Superpriority Financing, (II) Authorizing The Debtors Limited Use Of Cash Collateral, (III) Granting Adequate Protection To The Prepetition Secured Parties, (IV) Modifying The Automatic Stay, (V) Scheduling A Final Hearing, And (VI) Granting Related Relief [Docket No. [69](#), Filed November 12, 2020]
- B. Limited Objection of Gator Antoine Partners, LLLP (Antoine), Gator Argate Gainesville, LLC (Argate), Gateway Retail Center, LLC (Gateway), Gator Flower Mound, LLC (Flower Mound) and Gator Green Acres, Ltd. (Green Acres), Shelby Partners, Ltd. (Shelby, and collectively with Antoine, Argate, Gateway, Flower Mound and Gator Shelby, the Landlords) to the above-captioned debtors (the Debtors) Motion for Entry of Interim and Final Orders Pursuant to 11 U.S.C. Sections 105, 361, 362, 363, 364, 503 and 507, Bankruptcy Rules 2002, 4001, 6002, 6004 and 9014 and Local Bankruptcy Rules 2002-1 and 4001-2, (I) Authorizing the Debtors to Obtain Post Petition Senior Secured Superpriority Financing, (II) Authorizing the Debtors Limited Use of Cash Collateral, (III) Granting Adequate Protection to the Prepetition Secured Parties, (IV) Scheduling a Final Hearing, and (V) Granting Related Relief [Docket No. [157](#), Filed November 30, 2020]
- C. Objection of Local Texas Tax Authorities to DIP Financing Motion [Docket No. [160](#), Filed November 30, 2020]
- D. Objection of the Official Committee of Unsecured Creditors to the Debtors' Motion for Entry of Interim and Final Orders Pursuant to 11 U.S.C. §§ 105, 361, 362, 363, 364, 503 and 507, Bankruptcy Rules 2002, 4001, 6003, 6004

and 9014 and Local Bankruptcy Rules 2002-1 and 4001-2, (I) Authorizing the Debtors to Obtain Post Petition Senior Secured Superpriority Financing, (II) Authorizing the Debtors Limited Use of Cash Collateral, (III) Granting Adequate Protection to the Prepetition Secured Parties, (IV) Scheduling a Final Hearing, and (V) Granting Related Relief [Docket No. [172](#), Filed December 2, 2020]

Related Documents:

- A. Interim Order Pursuant to 11 U.S.C. §§ 105, 361, 362, 363, 364, and 507, Bankruptcy Rules 2002, 4001, 6004 and 9014 and Local Bankruptcy Rules 4001-2, (I) Authorizing the Debtors to Obtain Postpetition Senior Secured Superpriority Financing, (II) Authorizing the Debtors' Limited Use of Cash Collateral, (III) Granting Adequate Protection to the Prepetition Secured Parties, (IV) Scheduling a Final Hearing, and (V) Granting Related Relief [Docket No. [49](#), Filed November 10, 2020]
- B. Omnibus Notice of First Day Pleadings, Entry of Certain Interim Orders, and Final Hearing Thereon [Docket No. [62](#)], Filed November 11, 2020]
- C. Notice of Proposed Final Order Pursuant to 11 U.S.C. §§ 105, 361, 362, 363, 364, 503 and 507, Bankruptcy Rules 2002, 4001, 6003, 6004 and 9014 and Local Bankruptcy Rules 2002-1 And 4001-2, (I) Authorizing the Debtors to Obtain Postpetition Senior Secured Superpriority Financing, (II) Authorizing the Debtors' Limited Use of Cash Collateral, (III) Granting Adequate Protection to the Prepetition Secured Parties, and (IV) Granting Related Relief [Docket No. [104](#), Filed November 18, 2020]
- D. Notice of Revised Proposed Final Order Pursuant to 11 U.S.C. §§ 105, 361, 362, 363, 364, 503 and 507, Bankruptcy Rules 2002, 4001, 6003, 6004 and 9014 and Local Bankruptcy Rules 2002-1 And 4001-2, (I) Authorizing the Debtors to Obtain Postpetition Senior Secured Superpriority Financing, (II) Authorizing the Debtors' Limited Use of Cash Collateral, (III) Granting Adequate Protection to the Prepetition Secured Parties, and (IV) Granting Related Relief [Docket No. [208](#), Filed December 3, 2020]**

**Status: The Debtors have submitted a proposed final form of order that resolves all of the objections raised. The Debtors will request entry of the proposed final form of order at the hearing. This matter is going forward.**

- 15. Motion of the Debtors for Entry of an Order Establishing Procedures for the Sale or Abandonment of De Minimis Assets [Docket No. [76](#), Filed November 13, 2020]

Response Deadline: November 30, 2020 at 4:00 p.m.

Responses Received:

- A. Maricopa County Treasurer's Objection To Motion Of The Debtors For Entry Of An Order Establishing Procedures For The Sale Or Abandonment Of De Minimis Assets [Docket No. [164](#), Filed December 1, 2020]

Related Documents:

**A. Certification of Counsel [Docket No. [206](#), Filed December 3, 2020]**

**Status: A proposed order has been filed under certification of counsel. No hearing is necessary unless the Court has questions on this matter.**

Dated: December 4, 2020

GREENBERG TRAURIG, LLP

/s/ Dennis A. Meloro

Dennis A. Meloro (DE Bar No. 4435)  
1007 North Orange Street, Suite 1200  
Wilmington, Delaware 19801  
Telephone: (302) 661-7000  
Facsimile: (302) 661-7360  
Email: melorod@gtlaw.com

-and-

Nancy A. Peterman (admitted *pro hac vice*)  
Eric Howe (admitted *pro hac vice*)  
Nicholas E. Ballen (admitted *pro hac vice*)  
77 West Wacker Dr., Suite 3100  
Chicago, Illinois 60601  
Telephone: (312) 456-8400  
Facsimile: (312) 456-8435  
Email: petermann@gtlaw.com  
howee@gtlaw.com  
ballenn@gtlaw.com

*Proposed Counsel for the Debtors and  
Debtors in Possession*